

Public comments and responses on the 2019 working draft eligibility report, by ORV

Scenery

The following segments were recommended by the public for a scenery ORV. If marked with asterisks, they are also confirmed as highly scenic per our GIS data. They are indicated in **bold** if carried forward by staff recommendation.

Anthracite

Bear Creek

Bridal Veil Creek

Bridal Veil Creek, Ingram

Bridal Veil Falls

Cement Creek

Coal Creek

Cow Creek

Curecanti Creek

Daisy Creek

East Dallas

East River Meanders

Escalante Creek

Ingram

North Clear Creek

North Fork Escalante/Kelso

Oh-be-joyful

Potter Creek

Poverty Gulch, Upper East

Roubideau

Ruby Anthracite

San Miguel

Slate River

Spring Creek

Tabeguache

Taylor

West Elk Creek

West Soap Creek

Anthracite

Recreation

The following segments are recommended by the public for a recreation ORV.

- **Anthracite Creek and Ruby Fork Tributary**

Public comments: *The Ruby Fork and the mainstem Anthracite River offers a very unique , mandatory hike-in paddling experience. Paddlers hike their crafts (e.g., kayaks, packrafts, canoes) three miles along the Dark Canyon Trail to the Ruby Fork of the Anthracite. Depending on the flows, the river provides continuous class IV-V whitewater and gradually gets easier after the confluence with the mainstem Anthracite River. Advanced paddlers from around the state travel to experience the awe-inspiring views and rapids of Ruby-Anthracite. This segment has the longest required hike in, making it both unique and attractive to adventurous paddlers. After the river flows have dropped, fishermen hike out into the Dark Canyon for some incredible dry-dropper fishing opportunities. The Ruby Fork and the Anthracite River have been recognized in paddling guide books since 1995 and described as wilderness in character with incredibly scenery.*

Both the Ruby Fork and the mainstem Anthracite offer jaw-dropping views of Marcellina Mountain that are unique to the river corridor. As the hiking trail connects with the Ruby Fork, you are surrounded by lupine, bluebells, and towering Aspens. Once on the water, Marcellina is viewed on the left and sheer cliff walls close you in on the right. At the confluence with the mainstem Anthracite the views only get more impressive as the river abuts against the dark, towering walls of Marcellina. The Dark Canyon has been described as “featuring cliff walls and towering vistas that rise hundreds of feet from river level”. On the Ruby Fork, the Draft Evaluation states that no ORVs were identified. We disagree with this finding and have identified unique paddling and fishing opportunities on this segment that meet the threshold of a Recreation ORV, as well as unique, river-dependent scenic views within the river corridor

Response: Concur with public comments supporting a recreation ORV, but are not carrying forward the Ruby-Anthracite tributary. One public comment noted that the popular recreation is limited to the main branch of the Anthracite, as understood by district staff: *“The main run that is starting to get popularized begins where Trail #836 reaches the Ruby Anthracite and ends at Erickson Springs.”*

- **Bear Creek**

Public comment: *Recreation: I disagree with GMUG Planning team's assessment that recreation along this National Recreation Trail is not river-related. Without the resulting carving of Bear Creek by the flowing river, this trail would not enjoy the popularity it holds for local residents and visitors alike. The USFS trail register monitored by the Ouray Trail Group indicates just over 2,600 and nearly 2,900 people hiked the trail in 2016 and 2017 respectively (with fewer in 2018 due to trail closure.) Studies have shown that typically only a third of users sign in, therefore one could estimate 7,500 to nearly 9,000 hikers utilize the Bear Creek Trail annually. People hike this trail BECAUSE of the river and the values it provides users including but not limited to the spectacular vistas and diverse geological features. In accordance with the eligibility criteria related to river-related recreation opportunities, I have engaged in or witnessed other users sightseeing, wildlife watching (for me an amazing honey-colored black bear along with elk, mule deer, bighorn and various raptors,) photographing, camping, hiking and hunting. No one floats or rafts this river for obvious reasons!*

As described by the USFS website: The Bear Creek Trail #241 is designated as a National Recreation Trail because of its unique and spectacular nature. The trail begins at Highway 550 and ends at the Yellow Jacket Mine. Switchbacks on the first part of the trail rise steadily for an

elevation gain of about 1,000 feet and cross a large talus field of unstable rock. Just after the switchbacks the trail narrows with steep drops offs. It then levels out for some stretches as it turns eastward along the Bear Creek gorge.⁴⁴ In the WSR Review Notes, the Forest Planning Team notes that “Recreation, although along a National Recreation Trail, is not river-related” and then proceeds to determine that this segment is not eligible. HCCA disagrees with this finding; the unique and spectacular nature of this trail is river-dependent and exists because of the Bear Creek gorge. This gorge was created by the erosional forces of Bear Creek and continues to host the beautiful creek along its bottom. Furthermore, as explained by Handbook section 82.14 – Outstandingly Remarkable Values: While the spectrum of resources that may be considered is broad, all features considered should be directly river-related. River values should meet at least one of the following criteria (emphasis added): 1. Located in the river or on its immediate shorelands (within 1/4 mile on either side of the river). 2. Contribute substantially to the functioning of the river ecosystem, and/or 3. Owe their location or existence to the presence of the river. The National Recreational Trail is located on Bear Creek’s immediate shorelands, within 1/4 mile of the river. Additionally, the National Recreational Trail would not exist but for the gorge and river; therefore, the ORV owes its existence to the presence of the river. Given that this ORV meets two of the criteria to be “river-related”, the Forest Planning Team should include this reach as eligible in the final eligibility evaluation as eligible for Scenic and Recreation ORVs.

Response: As noted above in the Scenic section, Bear Creek is not “highly scenic” according to our GIS data, which forms the objective portion of the scenery criteria. With respect to recreation, although we recognize there are vast numbers of hikers on this trail, and we correct earlier statements and acknowledge that the trail use is river-related, staff do not find that it constitutes an outstandingly remarkable opportunity within the region of comparison. They are not unique or rare within the region of comparison. However, the GMUG will be looking more closely at this segment for potential inclusion for a geology ORV.

- **Big Blue Creek**

Public comment: Big Blue Creek offers excellent recreational fishing and hiking opportunities. Slide Lake offers excellent recreational fishing for brook and rainbow trout and exceptional hiking.

Response: While we agree that this is an excellent recreational opportunity, it does not constitute an outstanding or remarkable opportunity within the region of comparison. However, the GMUG will be looking more closely at this segment for potential inclusion for a geology ORV.

- **Bridal veil**

Public comment: It is still a popular ice-climbing area.

Response: While we agree that this is an excellent recreational opportunity, it does not constitute an outstanding or remarkable opportunity within the region of comparison.

- **Cement Creek**

Public comment: The Cement Creek corridor attracts visitors from throughout the U.S. looking for backcountry recreation opportunities to mountain bike, fish, hunt, hike, view wildlife, and sightsee. The campground located along Cement Creek is very popular all summer. I myself enjoy the beauty, solitude, and opportunities to see wildlife.

Response: While we agree that this is an excellent and popular recreational opportunity, it does not constitute an outstanding or remarkable opportunity within the region of comparison.

- **Cow Creek**

Public comment: CPW recommends including recreation as an ORV, given that there is a recreational fishery for cutthroat trout in the mainstem of Cow Creek.

Response: While we agree that this is an excellent recreational opportunity, it does not constitute an outstanding or remarkable opportunity within the region of comparison. However, we did find this segment eligible for other ORVs (scenery, geology).

- **Daisy Creek/Poverty Gulch**

Public comment: Daisy Creek has become a popular hike in, committed kayaker run renowned by boaters in Colorado. This recreational opportunity is high quality and, in combination with Oh-Be-Joyful, attracts visitors from far away. There are few opportunities for narrow creek boating in this area and regionally. The Daisy Creek run is another run that has made it into the Whitewater of the Southern Rockies guide as an exceptional four-star recreational boating asset. It is a fast class V- reach that is less than a mile long (.9 miles) and contains two signature drops, Big Wood Falls ("Big Woody") and Rip Your Head Off. There have been multiple YouTube videos that capture this experience: <https://vimeo.com/134668326>.

Daisy Creek flows from its headwaters in Daisy Pass through Poverty Gulch and into the Slate River. Advanced paddlers put in below the first significant falls (40' tall) and quickly find themselves in fast moving water that drops over a series of short slides and drops. The thrill of the whitewater heightens as Big Woody Falls (22' tall) approaches. While still technical, Big Woody Falls offers a unique waterfall experience, without the commitment required of Oh-Be-Joyful.

Poverty Gulch is the highest altitude creek run in the valley and includes an amazing 20' clean waterfall in the shadow of Mineral Point. It is a step down in difficulty from Oh-Be-Joyful so it provides a good step-up run for paddlers looking to test themselves on the unique feel of Crested Butte whitewater.

Response: The GMUG will be looking more closely at this segment for potential inclusion for a recreational ORV, amongst a group of popular kayaking/boating segments: Daisy Creek/Poverty Gulch; East River; Slate River; Upper Taylor to determine which are outstandingly remarkable within the region of comparison per our criteria.

- **East River**

Public comment: The primary section of the "Upper East" is the easiest of the four high-quality creeks in Crested Butte, but the end of this stretch includes "Stupid Falls", a spectacular waterfall that is one of the tallest in the state. At moderate flows, the upper stretch provides a unique opportunity for intermediate paddlers to test their skills on slides and moderately sized falls.

Response: The GMUG will be looking more closely at this segment for potential inclusion for a recreational ORV, amongst a group of popular kayaking/boating segments: Daisy Creek/Poverty Gulch; East River; Slate River; Upper Taylor to determine which are outstandingly remarkable within the region of comparison per our criteria.

- **Escalante Creek**

Public comment: Escalante Creek has smoothed and sculpted the Precambrian metamorphic rock through which it flows, creating a series of chutes, falls, and plunge pools. These features are rare. During the spring snowmelt, high water surges through the Potholes area, attracting extreme kayakers from all over the western United States. The complex hydraulic features challenge even the most experienced kayakers. Later in the season, as the snowmelt tapers off and the creek returns to a more sedate and steady flow, the potholes are used for wading, swimming, and streamside camping by groups and individuals, primarily from Colorado's West Slope.

Response: Though beautiful, staff did not find Escalante Creek to be outstandingly remarkable for its geology. Though a popular local destination for recreation, it does not attract general visitors from beyond the region nor is it unique or rare within the region of comparison. With respect to its potential larger attraction for extreme kayaking, the limitation of this kind of recreation to the experienced does not meet this criteria: "rivers that support only limited recreation for a narrower range of users (e.g., only users with advanced skill levels) in the river corridor are generally less outstanding and remarkable." For these reasons, it is not outstandingly remarkable for recreation.

- **Lamphier Lake**

Public comment: Lamphier Lake is an outstandingly beautiful lake surrounded by unique geologic features and providing one of the best backcountry lake angling opportunities in the region.

Response: While we agree that this is an excellent recreational opportunity, it does not constitute an outstanding or remarkable opportunity within the region of comparison.

- **North Clear Creek**

Public comment: North Clear Creek has a beautiful scenic waterfall, North Clear Creek Falls, which attracts recreationalist who photograph the falls and enjoy its scenic beauty. Not only is the falls remarkably beautiful, but it is unique in its access as it is handicap accessible. As "one of the most photographed waterfalls in Colorado", a quick google images search reveals over 100 images of North Clear Creek posted to the internet.

Response: This is not a named segment within our required list of segments to be studied for eligibility. This may be misnamed within our database, but we cannot locate a North Clear Creek.

- **Oh-be-joyful** - concur with public comments regarding recreation ORV.

- **San Miguel** - concur with public comments regarding recreation ORV.

- **Slate River, multiple segments**

Public comments:

This segment - headwaters to Poverty Gulch/Daisy Creek - of the Slate River (known as the North Fork Slate to most paddlers) provides the most challenging creek boating experience in the Gunnison Valley. It is famous for its gigantic falls, the North Fork Slate Falls, and extremely tight

chutes¹². Guide books have given it a 4-star rating and it provides a unique challenge for the bravest of paddlers¹³. The Class V+ paddling section starts approximately one mile upstream from the confluence with Poverty Gulch.

This stretch – Poverty Gulch to Oh-Be-Joyful – of the Slate River has been recognized in multiple guidebooks for the region. It provides a different experience than the other creeks in the valley; its gradient is less significant than the other creeks in the area and the hydraulics are fierce. Still a challenging Class V kayaking run, this segment has a longer paddling season than its neighbors.

In the past few years this segment – Oh-Be-Joyful to Town of Crested Butte - of the Slate River has become incredibly popular for Stand Up Paddleboarding (SUPing), a relatively new sport. It has been recognized as some of the best SUPing in the state for its mellow floating experience, grandeur views of the Slate River Valley, and surrounding natural environment. This segment also offers a rare beginner opportunity for kayakers. In the Upper Gunnison Valley there are no other flatwater boating opportunities where people can learn to kayak in a safe environment.

Response: The GMUG will be looking more closely at this segment for potential inclusion for a recreational ORV, amongst a group of popular kayaking/boating segments: Daisy Creek/Poverty Gulch; East River; Slate River; Upper Taylor to determine which are outstandingly remarkable within the region of comparison per our criteria.

- **Taylor - Upper**

Public comment: A high mountain gem - the Upper Taylor River offers unique paddling and fishing opportunities. The river is incredibly scenic, with continuous beginner-intermediate whitewater. The GMUG does not offer many beginner-intermediate paddling runs, making this stretch a unique attraction for rafters, family floating trips, and kayakers alike. In addition, this stretch is very popular for dry-fly fishing opportunities.

Response: As noted above in the Scenic section, the Taylor is not “highly scenic” according to our GIS data, which forms the objective portion of the scenery criteria. The GMUG will be looking more closely at this segment for potential inclusion for a recreational ORV, amongst a group of popular kayaking/boating segments: Daisy Creek/Poverty Gulch; East River; Slate River; Upper Taylor to determine which are outstandingly remarkable within the region of comparison per our criteria.

- **Taylor - Lower**

Public comments: Lower Taylor River traverses lush and diverse riparian habitats, including a unique combination of wet meadows, grassy slopes, cottonwood galleries, and sage country. All these healthy ecosystems support and provide excellent backdrop for exemplary fly fishing and rafting opportunities along the river.

The Taylor River Canyon between Lottis Creek and the FS Boundary near Almont offers Class II - IV paddling opportunities in a scenic canyon setting. This stretch brings the local paddling community together for a well-loved “Taylor Tuesday” tradition and attracts paddlers from across the state. The Taylor Canyon boasts one of the longest paddling seasons in the Upper

Gunnison Valley and its boulder-garden character sets it apart from other rivers in the area. In addition, the Taylor River is host to an annual Kayak and Raft Race as part of the Gunnison River Festival. This special river canyon brings together extreme kayakers, rafters, and beginners, providing an experience for all types of paddlers.

This reach is a class III+ stretch of whitewater that is well-loved by locals and visitors to the Upper Gunnison Basin alike. This reach has several outstanding rapids, including the Slot, Rodeo Rapid, Toilet Bowl, and many others. One of the things that makes this reach so unique is that it provides a range of whitewater experiences for everyone from the novice to the expert during peak flows. The Whitewater of the Southern Rockies guide rates this reach as four-stars during medium and high flows. This reach attracts boaters from all over the State of Colorado. It also hosts an annual kayak/rafting race, the Rocky Mountain Rafts Downriver Raft and Kayak race during the Gunnison River Festival.

For example, the Taylor River was originally found to be eligible in the 2006 evaluation but has now been dropped by the Forest Supervisor because he felt that the fisheries did not meet the ORV criteria for fish. We feel that this river epitomizes the definition of a Wild & Scenic River classified as Recreational. The Gold Medal fishery of the Taylor River below the reservoir is regionally unique, attracting anglers from all over the Nation. It also supports private and commercial rafting and kayaking activities in an outstanding setting that is unsurpassed in much of Colorado.

Response: Accessibility contributes to the recreational value of a segment. Due to issues with accessibility on this segment, despite its otherwise high value for recreation, it is not outstandingly remarkable within the region of comparison.

- **Uncompahgre**

Public comment: From Ouray to the KOA CG downstream of town, the Uncompahgre provides a popular and challenging class IV-V paddling stretch known to the locals as the Quality Quickie. This segment has been in the guide books since 1995 and continues to grow in popularity; Whitewater of the Southern Rockies gives it a 4-star rating.

From Red Mountain Creek to the Ouray Ice Park, the Uncompahgre Gorge offers challenging Class IV-V whitewater in an incredibly scenic gorge. This is the most challenging section of the Uncompahgre River, as well as the most remote. The canyon walls within the Uncompahgre Gorge are among the tightest in Colorado (see photo).

Response: While we agree that these are excellent recreational opportunities, they do not constitute an outstanding or remarkable opportunity within the region of comparison.

Geology

Following segments recommended by public for Geology ORV.

- **Anthracite** - concur with public comments regarding scenery ORV.
- **Bear Creek**

Public comment: *Geology: As mentioned above in the "scenic" section, Bear Creek is home to spectacular and varied geological features from gorges to intrusions to volcanic pinnacles. Perhaps most notable are the fossilized tidal ripple marks. Given that, according to eligibility criteria, (p. 4) "ORVs are defined as unique, rare or exemplary features that are significant within the associated regions of comparison. They are conspicuous examples of these values and among the best representatives of these features. Only one such value is needed for eligibility," I would argue that Bear Creek is eligible based solely upon this geologic feature. In addition, the San Juan geologic formation of volcanic tuff (easily eroded) results in dramatic cliffs and spires atop the much older and resistant slate and quartzite of the Precambrian Uncompahgre Formation that is traversed in multiple places along the trail as is exposed by the river's carving. Throughout the entire river corridor and at the confluence of the main and south fork of Bear Creek, the geology is imposing and spectacular and worthy of ORV status.*

Response: *The GMUG will be looking more closely at this segment for potential inclusion for a geology ORV.*

- **Big Blue Creek and Slide Lake**

Public comment: *There is a natural lake that formed mid-creek after a rock slide tore across the creek in the 1940s. Slide Lake is a unique geologic feature; it is a natural lake that was not created by the same means as others in the area. While most GMUG lakes were carved out glacially, Slide Lake was created by a rockslide. This makes it a unique lake.*

Response: *The GMUG will be looking more closely at this segment for potential inclusion for a geology ORV.*

- **Cow Creek** - concur with public comments regarding scenery ORV.

- **East River**

Public comment: *The East River features stunning meanders between Gothic and Mt. Crested Butte before travelling behind the Crested Butte Mountain Resort ski area. This segment is below Stupid Falls at the beginning of the East River meanders and extending down to the Mount Crested Butte Water and Sanitation District pumphouse. Free-Flowing - This section of the river is free-flowing (irrigation occurs off of the Perry Creek tributary).*

Outstanding Remarkable Values - Scenic. The East River meanders are some of the most iconic in the nation. Looking down on the East River one sees a gorgeous meandering stretch with oxbow after oxbow linking up in a serene pattern. In summer it attract photographers and local artists that attempt to capture the serene beauty of this reach.

Geologic. The Handbook criteria include a description for geology that "the feature(s) may be in an unusually active stage of development, represent a "textbook" example, or represent a unique, rare or exemplary combination of geologic features (erosional, volcanic, glacial, or other geologic structures)." The East River meanders are and exemplary "textbook" example of an oxbow river system. The textbook structure of this system has been documented in studies; one described that "Lidar and Worldview 2 multispectral satellite imagery collected in 2015 revealed approximately 100 abandoned channels in our 10 kilometer long study reach that occupy

approximately 25% of the floodplain. Abandoned channels preserve the shape of former river meander bends.” Thus, the East River meanders meet the criteria for a geologic ORV.

Classification - Scenic. There is a dirt road allowing access to the river along the East River meanders. Above the river corridor (but outside of the wild and scenic corridor) the Gothic Road parallels the meanders and provides a view for those traveling to Gothic. Otherwise this segment is largely inaccessible.

Response: *While scenic, it does not meet the threshold for outstandingly remarkable values of scenery (very high scenic integrity, class A scenic attractiveness, and scenic class 1, combined with professional opinion that it is unique or exemplary within the region of comparison.) However, the GMUG will be looking more closely at this segment for potential inclusion for a geology/scientific ORV.*

- **Escalante Creek**

Public comment: *The Escalante Potholes are a regionally rare geological and hydrological streambed feature in the lower reach of this segment. The potholes are hourglass-shaped erosional features occurring in hard Precambrian gneiss where it intercepts the streambed of Escalante Creek. Stream channel knickpoints have formed in the overlying softer sedimentary rock units, providing high velocity waters with adequate sediment supply and hydrologic energy to produce circulating erosive water currents. The scouring process that occurs primarily during the annual spring snowmelt has taken thousands of years to produce the current state of the potholes. There are no other areas in the region where Precambrian gneiss is exposed and shaped by a stream powerful enough to create these features, yet not so powerful as to completely erode the stream channel smooth. This rare combination of lithology and erosion demonstrates not only the efficacy of hydrology upon geology, but also the creative sculpturing action that time and water have upon a very resistant medium. With almost any other medium, such as sandstone or even marble, these effects would not have produced such dramatic features as the potholes of Escalante Creek.*

Response: *Public comment centers on geologic features of the stream segment (the Potholes) that are not located on GMUG lands.*

- **Lamphier Lake**

Public comment: *Geologic. Like other lakes in Colorado, Lamphier Lake is a glacial tarn surrounded by a bowl of granite and schist. What makes this high alpine lake unique is that this substrate is capped by a layer of unusual limestone, a geologic feature that contributed to the creation of the adjacent Fossil Ridge Wilderness area. This sedimentary overburden is rich in fossils; this unique layer gives the Fossil Ridge Wilderness its name. As shown in the included photograph, this unique layer is immediately above the lake in the corridor area.*

Response: *The geologic example provided indicates it is part of a much larger landscape (the Fossil Ridge Wilderness area), so it is neither unique or rare.*

- **North Fork Escalante/Kelso**

Public comment: Kelso Creek in particular provides continued natural surface flow and resultant fluvial processes such as flood scouring, lateral flow, and channel meandering—all necessary to maintaining a dynamic distribution of riparian and wetland plant associations along the drainage.

Response: We found this segment eligible, but not for geology ORVs. The description of a functioning hydrologic system is in part what contributes to its role as outstandingly remarkable native cutthroat fish habitat, but it does not in and of itself stand out as an outstandingly remarkable geologic feature.

- **Potter Creek**

Public comment: Roubideau's tributary streams are similarly appealing; one such tributary overlooked in the eligibility report is Potter Creek, which the BLM also found eligible. I encourage the GMUG to add its upstream reach of Potter Creek as an eligible wild segment with similar ORVs of scenic, geologic and vegetative ORVs.

Response: The GMUG will be reviewing this segment to confirm if the ORVs identified on the BLM lands do indeed continue onto the national forest.

- **Roubideau** – concur with public comments regarding scenery ORV.

- **Spring Creek**

Public comment: The other stream reach mentioned that deserves listing as eligible is Spring Creek on the Paonia Ranger District. This stream only flows for a short distance on National Forest, but its origin is hydrologically unique. Two very large springs located at the base of the Ragged Mountains uplift discharge continuous flows of water sufficient to sustain well developed wetlands and also a resident cold water fisheries and other aquatic associate biota. This feature was being proposed as a Special Interest Area during the Plan revision efforts in 2006. The Forest Service was successful in convincing the Colorado Water Conservation Board to adopt a minimum instream flow on Spring Creek in large part because of this remarkable hydrologic feature. This hydrologic condition is a rarity in Colorado and certainly could be considered as an Outstanding Remarkable Value under either the scenic, geologic or other (scientific) categories. This stream should be re-examined. I believe it would be found to be eligible and classified as "Wild".

Response: The GMUG will be looking more closely at this segment for potential inclusion for a geology ORV.

- **West Elk Creek** - concur with public comments regarding scenery ORV.

- **West Soap Creek** - concur with public comments regarding scenery ORV.

Fish/Wildlife

Following segments recommended by public for fish/wildlife ORVs.

- **Brush Creek – Upper and West Brush Creek tributary**

Public comment: East Brush Creek and Upper Cochetopa Creek should be included in the eligibility report because of their fisheries value. Both include solid populations of cutthroat trout throughout their reach. Not only are these populations threatened from non-native introduction of brook and brown trout, they also provide some of the most beautiful trout fishing in our valley.

The proposed segment for eligibility is the entire West Brush Creek tributary and the upper portion of the mainstem of Brush Creek. The West Brush Creek segment begins at the headwaters and extends down to the confluence with Middle Brush Creek. The Brush Creek segment begins at the start of Brush Creek (the confluence of West and Middle Brush creek) and ends where Brush Creek first leaves USFS lands. Free-Flowing: West Brush Creek is entirely free-flowing with no diversions or impoundments. The segment of Brush Creek that is recommended has no diversions or impoundments. Outstanding Remarkable Values: Wildlife/Habitat. West Brush Creek and Upper Brush Creek provides important habitat for a rare and ecologically crucial boreal toad population that is dependent on the West Brush Creek and Brush Creek aquatic and riparian natural environment. USFS Region 2 classifies the boreal toad as a sensitive species and the boreal toad is presently listed as an endangered species by the State of Colorado.²¹ The Boreal Toad has also been found by the Colorado Natural Heritage Program (CNHP) to be “critically imperiled” at the state level. The CNHP defines critically imperiled as “at very high risk of extinction due to extreme rarity (often 5 or fewer populations), very steep declines, or other factors.”²² Part of this decline is attributed to habitat loss²³; preserving the limited occurrences of breeding habitat in the region is a management priority for multiple state and federal agencies. These toads rely on beaver ponds and aquatic and riparian habitat to breed.²⁴

Although “Boreal toads were once common throughout the Elk and West Elk mountains of western Colorado” significant declines in have been noted “in the boreal toad populations in this region of Colorado.”²⁵ Rare breeding populations of boreal toads are found along West Brush Creek and Brush Creek proper.²⁶ The stream habitat for Boreal Toads is an outstandingly remarkable value. Classification: Scenic. West Brush Creek is only accessible by trails and primitive 4x4 roads.

Response: This segment, while hosting cutthroat trout, does not meet the GMUG’s criteria for an outstandingly remarkable value for fisheries.

This segment, while hosting boreal toad, is not identified as chytrid-free, so it does not meet the threshold for wildlife -boreal toad for an outstandingly remarkable value.

- **Coal Creek**

Public comment: The NPS has identified Coal Creek as eligible for wild and scenic in their assessment of the Curecanti National Recreation Area.³⁴ They identified three ORVs for a reach that shares many of the same characteristics as the upstream USFS segment identified herein. In the NPS assessment it was classified as eligible for scenic, fish, and wildlife ORVs.

Segment - Headwaters to the USFS boundary.

Outstandingly Remarkable Values - Like Curecanti Creek, Coal Creek should be assessed upstream in the West Elk Wilderness for scenic, fish and wildlife values. The WSR Review Notes simply state that “Nationwide Rivers Inventory portion within Curecanti NRA, NPS confirmed no

record of being considered eligible, GMUG portion no ORVs identified.” However, it is unclear from the review notes provided by the NPS whether the upstream GMUG portion of these reaches were assessed for any ORVs. Given that the lower segment of Coal Creek was found eligible by NPS for Scenic, Wildlife, and Fishery ORVs, the upper portion of the creek should be assessed for similar values. Particularly when values include fishery and wildlife on the lower portion of the reach, these values may extend upstream out of NRA boundaries. Classification Wild. The headwaters of Coal Creek are in the remote West Elk Wilderness area and only accessible by hiking trails.

Response: *The GMUG will be looking more closely at this segment to determine if either the wildlife or scenery ORVs on the NPS unit continue onto the national forest, per the ORV criteria used in this process. The GMUG’s criteria for a fishery ORV is different than the criteria the NPS used, and this segment does not meet that criteria.*

- **Cochetopa Creek (Upper)**

Public comment: *Cochetopa Creek in particular is one of the most beautiful backcountry fishing destinations in Colorado. From its headwaters on San Luis to Dome Lakes SWA, the creek is remote and supports a variety of wildlife.*

Response: *This segment, while hosting cutthroat trout, does not meet the GMUG’s criteria for an outstandingly remarkable value for fisheries.*

- **Copper Creek and Copper Lake** – We agree with public comments recommending the addition of Copper Lake as eligible. We agree with public comments supporting the wildlife ORV for Copper Creek and tributaries and Copper Lake.

- **Curecanti Creek**

Public comment: *We encourage the Forest Planning Team to re-examine Curecanti Creek for eligibility to assess the fishery and recreational fishing values that extend upstream of NPS boundaries. Segment - Headwaters to the USFS boundary. Free-Flowing - This reach of Curecanti Creek is free-flowing, with no diversions or impoundments. Outstanding Remarkable Values - The NPS has agreed that Curecanti Creek should be eligible for wild and scenic eligibility in their assessment of the Curecanti National Recreation Area.³³ One of the ORVs that makes this creek “eligible” in the NPS analysis extends onto USFS lands. In the NPS analysis, the NPS identified the downstream segment of Curecanti for its fishery, as well as for its scenic values. Although the scenic values identified in the NPS report are primarily located on the lower segment of the creek, the upper portion shares the same fishery and fishing characteristics identified in the NPS analysis.*

Response: *The GMUG’s criteria for a fishery ORV is different than the criteria the NPS used, and this segment does not meet that criteria. Compared to other segments considered for a recreational fishery ORV, this segment does not represent an outstandingly remarkable opportunity within the region of comparison.*

- **East River**

Public comment: *Having lived near the East River for over 40 years I have noticed it is a migratory waterway for many species of wild life. During a spring storm is a good time to see what gets flushed out of the sky and takes shelter on or near the river. We saw a flock of glossy ibis one April. Rarer ducks always pass thru. We saw a wood duck one time. Not that rare in*

other parts, but we never saw another. It is also a buffer zone from the increasing pressures of civilization for human as well as wild creatures and deserves special designation.

Response: *This segment, despite being wildlife habitat, does not meet the GMUG's criteria for an outstandingly remarkable value for wildlife. However, the GMUG will be looking more closely at this segment for potential inclusion for a recreational ORV, amongst a group of popular kayaking/boating segments: Daisy Creek/Poverty Gulch; East River; Slate River; Upper Taylor to determine which are outstandingly remarkable within the region of comparison per our criteria.*

- **Escalante Creek**

Public comment: *Escalante Creek is regionally important habitat for resident populations of native roundtail chubs, bluehead suckers, and flannelmouth suckers, as well as serving as a spawning site for Gunnison River populations of all three of these BLM and Colorado sensitive species. The national forest portion of Escalante Creek includes no impoundments or structures. It is paralleled by an unpaved road, so it qualifies for wild or scenic classification. Escalante Creek should retain its 2005 eligibility, or it should be added to the streams studied in the draft eligibility evaluation and found eligible with outstandingly remarkable values vegetation/botanical, recreation, geologic, wildlife, and fish/rare species.*

Response: *It is the GMUG's understanding that the habitat for the three sensitive fish species is on BLM lands. See elsewhere for discussion of other suggested ORVs.*

- **Horsefly Creek**

Public comment: *Approximately 17.8 miles, from source to national forest boundary (or approximately 12 miles, from national forest/private land boundary to national forest boundary), classification wild, outstandingly remarkable values fish, wildlife/rare species, vegetation. The national forest portion of Horsefly Creek includes no impoundments, structures, or constructed routes. The lower reach crosses a low-maintenance trail. It therefore qualifies for wild classification or, at least, wild above the trail crossing, scenic below the crossing. Horsefly Creek should be added to the list of streams studied in the draft eligibility evaluation, and it should be found eligible with outstandingly remarkable values fish, wildlife/rare species, and vegetation.*

Response: *This segment, despite being wildlife habitat, does not meet the GMUG's criteria for an outstandingly remarkable value for wildlife, nor does it meet the GMUG's criteria for an outstandingly remarkable value for fisheries.*

- **Fall Creek** – concurred with public comments supporting a fish ORV for this segment, and added this segment to those considered eligible.
- **Kelso Creek** - agree with public comments supporting fish ORV
- **Lamphier Lake**

Public comment: *Fishery. Lamphier Lake is home to a Colorado Cutthroat trout fishery. As noted in our general recommendations, the rarity of Cutthroat across the historic range and need to provide special protections.*

Recreation: *Lake fishing. In addition to displaying unique geologic features, Lamphier Lake also offers extraordinary fishing.*

Response: This segment does not meet the GMUG's criteria for an outstandingly remarkable value for fisheries. Compared to other segments considered for a recreational fishery ORV, this segment does not represent an outstandingly remarkable opportunity within the region of comparison.

- **Lower Taylor**

Public comment: Lower Taylor River - 20.2 miles, recreational classification, 2005 outstandingly remarkable values recreation, fisheries. Lower Taylor River traverses lush and diverse riparian habitats, including a unique combination of wet meadows, grassy slopes, cottonwood galleries, and sage country. All these healthy ecosystems support and provide excellent backdrop for exemplary fly fishing and rafting opportunities along the river. In addition to the recreation and fisheries ORV identified in 2005, the Lower Taylor River includes GMUG interdisciplinary team-identified scenic ORV; Colorado Parks and Wildlife (CPW)-identified bald eagle communal roosts, roost sites, winter concentration, winter forage, winter night roost sites, and winter range; U.S. Fish and Wildlife Service (FWS)-identified Gunnison sage-grouse occupied habitat; CPW Gunnison sage-grouse overall range, production area, and winter range; CPW bighorn migration corridors, migration patterns, production area, severe winter range, summer concentration area, and winter concentration area; CPW black bear fall concentration; Colorado Natural Heritage Program (CNHP) potential conservation areas L4 higher biodiversity; CNHP element observation mountain draba (mountain Whitlock-grass); CNHP element occurrence Black Canyon gilia high precision public land L1; CNHP element occurrence montane riparian forests high precision public land L1; CNHP element occurrence mountain bladder fern low precision public land L1; along with CPW elk migration corridors, migration patterns, severe winter range, and winter concentration area; and CPW mule deer severe winter range, winter concentration, and migration patterns. Lower Taylor River includes no impoundments. Since it is crossed and paralleled in part by a road and some structures, it qualifies for recreational classification. Lower Taylor River should retain its 2005 eligibility, or it should be added to the streams studied in the draft eligibility evaluation and found eligible.

Response: This segment, despite being wildlife habitat, does not meet the GMUG's criteria for an outstandingly remarkable value for wildlife, nor does it meet the GMUG's criteria for an outstandingly remarkable value for fisheries.

- **Monitor Creek**

Public comment: Approximately .75 mile, from source to national forest/BLM boundary, wild classification, outstandingly remarkable values vegetation, fish. Immediately downstream of the GMUG portion of Monitor Creek, the BLM Uncompahgre Field Office (UFO) has determined its portion of Monitor Creek is wild & scenic eligible, with wild classification; it is found wild & scenic suitable in the BLM final suitability report (and included in preferred alternative for the proposed UFO Resource Management Plan). Between eligibility and suitability, the BLM determined that Monitor Creek contains viable populations of bluehead sucker and flannelmouth sucker, adding the outstandingly remarkable value for fish. The Forest should correspondingly find Monitor Creek eligible with ORVs vegetation and fish/rare species. Outstandingly remarkable values documented on Monitor Creek is vegetation. Specifically, the stream corridor contains areas of narrowleaf cottonwood/strappleaf willow/silver buffaloberry riparian forest (*Populus angustifolia*/*Salix ligulifolia*/*Shepherdia argentea*), which is classified as critically imperiled globally (G1). Areas of globally imperiled (G2) Fremont cottonwood/skunkbush sumac riparian woodland (*Populus deltoides* spp. *Wislizeni*/*Rhus trilobata*) also occur along this stream. In addition,

Monitor Creek contains a superior (A-ranked) occurrence of the common coyote willow riparian shrubland (*Salix exigua*/mesic graminoids). Monitor Creek is within the Colorado Natural Heritage (CNHP) Roubideau Creek Potential Conservation Area. In addition, the BLM has now documented that its downstream portion of Monitor Creek also supports a superior (A-ranked) occurrence of the common coyote willow riparian shrubland (*Salix exigua*/mesic graminoids). Monitor Creek drains from the Uncompahgre Plateau portion of the GMUG National Forest, with high streamflow typically occurring during spring snowmelt. The national forest portion of Monitor Creek includes no impoundments, structures, or constructed routes. It therefore qualifies for wild classification. Monitor Creek should be added to the list of streams studied in the draft eligibility evaluation, and it should be found eligible with outstandingly remarkable values vegetation and fish, consistent with and complementary to eligibility finding, and pending suitability finding, by the BLM.

Response: The GMUG's criteria for both vegetation and fisheries is different than the criteria the BLM used, and this segment does not meet that criteria.

- **Multiple segments:**

Cooperating agency comment: Additional conservation populations that warrant consideration for eligibility include West Antelope Creek, the Clear Fork of Muddy Creek and tributaries (North and South Twin, Rock, Second and Basin Creeks), Deep Creek (near Paonia Reservoir), North Anthracite Creek (and the entire Anthracite drainage, even though cutthroat are only in the North Fork), Schaefer Creek, Robinson Creek, Goat Creek, Elk Creek (near Telluride), Beaver Dams Creek, the North Fork of the Smith Fork of the Gunnison, Red Canyon Creek, the East and West Fork of Deep Creek (near Telluride) and Fall and Muddy Creeks upstream of Woods Lake. These represent some of the more robust and remote populations of green lineage Colorado River cutthroat trout on the forest, and many of the drainages appear to meet other ORVs listed in the Draft Evaluation. In addition, CPW encourages the GMUG planning team to work with our sister agency, the Colorado Water Conservation Board (CWCB), to consider utilizing its Instream Flow Program as an alternative method of protection for flow-related ORVs.

Public comment: Specifically, we urge the Team to reconsider West Antelope Creek and West Steuben Creek for eligibility due to presence of conservation populations of cutthroat trout.

Response: While the GMUG appreciates there are many, many more locations on the forest with valuable native fisheries habitat, there should be a high threshold for truly being "outstandingly remarkable within the region of comparison". Not simply excellent, but unique, rare, exemplary. Since the publication of the working draft eligibility report, the GMUG has added Anthracite to its list of eligible segments, but for recreation and scenery values. The GMUG has also added Fall and Muddy creeks upstream of Woods Lake for fisheries ORVs. Otherwise, the noted segments do not meet the GMUG's criteria for an outstandingly remarkable value for fisheries.

- **North Fork Escalante Creek** - agree with public comments supporting fish ORV
- **Points Creek** – agree with public comments supporting fish ORV
- **Potter Creek**

Public comment: Approximately 6.5 miles, from source to national forest/BLM boundary, wild classification, outstandingly remarkable values vegetation, fish. Immediately downstream of the GMUG portion of Potter Creek, the BLM Uncompahgre Field Office (UFO) has determined its

portion of Potter Creek is wild & scenic eligible, with wild classification; BLM found it to be wild & scenic suitable in the BLM final suitability report (and included in the preferred alternative for the proposed UFO Resource Management Plan). The national forest portion of Potter Creek includes no impoundments, structures, or significant constructed routes. The upper stream crosses the Roubideau Mesa Trail. It therefore qualifies for wild classification either for its full length or for the portion downstream of the trail. Potter Creek should be added to the list of streams studied in the draft eligibility evaluation, and it should be found eligible with outstandingly remarkable values vegetation and fish, consistent with and complementary to eligibility finding, and pending suitability finding, by the BLM.

Response: *The GMUG's criteria for both vegetation and fisheries is different than the criteria the BLM used, and this segment does not meet that criteria.*

- **Roubideau Creek**

Cooperating agency comment: *CPW agrees with the ORVs listed in the Draft Evaluation for Roubideau Creek and Tributaries. CPW recently established the significance of Roubideau Creek for native fish spawning just below the Forest Service boundary and recommends that a fish ORV be added to the Draft Evaluation. Native Fish Researchers with CPW have sampled Roubideau Creek up to the Forest boundary at Ben Lowe Flats and found native sucker larvae. Just downstream, near Criswell Creek, roundtail chub larvae were found. Roubideau Creek and its tributary streams are of vital importance to flannemouth suckers, bluehead suckers and roundtail chub. CPW tracks movements of PIT-tagged fishes into Roubideau Creek from the Gunnison River and recently concluded a four-year study of spawning in the drainage. More than 10,000 native suckers and chubs have been documented using Roubideau and its tributaries during spring runoff for spawning in a single year. Diminishment of flows coming off of the Uncompahgre National Forest to Roubideau Creek could be deleterious to populations of these native fish in the Gunnison River. CPW Native Fish Researchers are confident that these species use portions of Roubideau Creek on the Uncompahgre National Forest also, and plan to continue work to establish the upstream extent of spawning use.*

Response: *The GMUG is looking more closely at the recommendation that this segment qualify for a fish ORV, which would require modifying the current criteria for the fish ORV.*

- **Tabeguache Creek**

Cooperating agency comment: *Tabeguache Creek and North Fork Tabeguache Creek is also an important native fish spawning stream and CPW recommends adding a fish ORV to the Draft Evaluation for Tabeguache Creek. In 2014, a barrier to upstream migration was removed from Tabeguache around 2 miles upstream of its confluence with the San Miguel River. This allows native roundtail chubs and bluehead and flannemouth suckers from the San Miguel to access several additional miles of spawning habitat in the spring. CPW has confirmed natural reproduction for these species in Tabeguache Creek since this barrier was removed. As with Roubideau Creek, this spawning is thought to primarily occur on BLM land; however, land and water use on USFS land upstream undoubtedly can impact this important resource value.*

Response: *Because the spawning is occurring on the portion of the segment crossing BLM lands, this segment does not qualify as outstandingly remarkable for fish on the national forest. We acknowledge that upstream use does affect downstream habitat, and that we can use other conservation measures and instruments (such as instream flows) to achieve meaningful outcomes for downstream fish. However, this segment is eligible due to a scenery ORV.*

Heritage

- **Beaver Creek**

Public comment: *Approximately 2 miles, from confluence with McCulloch Creek to national forest/BLM boundary, classification wild, outstandingly remarkable value vegetation. Immediately downstream of the GMUG portion of Beaver Creek, the BLM Uncompahgre Field Office (UFO) has determined its portion of Beaver Creek is wild & scenic eligible, with scenic classification; BLM found it to be wild & scenic suitable in the BLM final suitability report (and included in the preferred alternative for the proposed UFO Resource Management Plan). The national forest portion of Beaver Creek includes no impoundments, structures, or constructed routes. The national forest portion therefore qualifies for wild classification (or at least scenic to correspond with downstream BLM classification). Beaver Creek should be added to the list of streams studied in the draft eligibility evaluation, and it should be found eligible with outstandingly remarkable value vegetation, consistent with and complementary to eligibility finding, and pending suitability finding, by the BLM.*

Approximately 2 miles, from confluence with McCulloch Creek to national forest/BLM boundary, classification wild, outstandingly remarkable value vegetation. Immediately downstream of the GMUG portion of Beaver Creek, the BLM Uncompahgre Field Office (UFO) has determined its portion of Beaver Creek is wild & scenic eligible, with scenic classification; BLM found it to be wild & scenic suitable in the BLM final suitability report (and included in the preferred alternative for the proposed UFO Resource Management Plan). The national forest portion of Beaver Creek includes no impoundments, structures, or constructed routes. The national forest portion therefore qualifies for wild classification (or at least scenic to correspond with downstream BLM classification). Beaver Creek should be added to the list of streams studied in the draft eligibility evaluation, and it should be found eligible with outstandingly remarkable value vegetation, consistent with and complementary to eligibility finding, and pending suitability finding, by the BLM.

Examination of aerial imagery suggests substantially similar riparian vegetation continues upstream onto the GMUG lands. We recommend that an approximately 1-mile long segment of Beaver Creek extending south from the GMUG/BLM boundary to the confluence with West Beaver Creek be included in the GMUG eligibility report and found eligible with a similar vegetation ORV, as the segment flowing through the adjacent BLM land.

*Outstandingly remarkable value documented on Beaver Creek is vegetation. Specifically, the stream corridor supports a superior (A-ranked) occurrence of globally vulnerable (G3) narrowleaf cottonwood/blue spruce/thinleaf alder riparian forest (*Populus angustifolia*/*Picea pungens*/*Alnus tenuifolia*). In addition, the Beaver Creek corridor includes Colorado Natural Heritage Program (CNHP) element occurrence Geyer's willow-Rocky Mountain willow/mesic forb high precision public land L1; CNHP conservation areas L4 higher biodiversity significance; Colorado Parks and Wildlife (CPW)-identified elk production area; CPW bald eagle winter range; CPW Gunnison sage-grouse overall range, production area, and winter range; U.S. Fish and Wildlife Service (FWS) Gunnison sage-grouse critical occupied habitat; along with CPW elk migration patterns and mule deer migration patterns. The national forest portion of Beaver Creek includes no impoundments, structures, or constructed routes. The national forest portion therefore qualifies for wild classification (or at least scenic to correspond with downstream BLM classification). Beaver Creek should be added to the list of streams studied in the draft eligibility evaluation, and it should be found eligible with outstandingly remarkable value vegetation, consistent with and complementary to eligibility finding, and pending suitability finding, by the BLM.*

Response: The GMUG's criteria for both vegetation and scenery is different than the criteria the BLM used, and this segment does not meet that criteria.

- **Cement Creek**

Public comment: Cement Creek is a coldwater snowmelt-driven stream located in Gunnison County, Colorado. The watershed extends east from the Crested Butte South municipality and on to USFS lands near Italian Mountain and Crystal Peak. The total Cement Creek watershed area is 35.7 square miles. The stream substrate ranges from small gravels to large boulders. There is a mixture of riffles and small pools that provide quality habitat for fish and other aquatic life. Cement Creek is home to a mixed fishery and sampling conducted by Colorado Parks and Wildlife in 2005 and 1973 identified a Colorado River Cutthroat population in the creek. The proposed reach extends from the Cement Creek Trail trailhead to below the Cement Creek Ranch where the creek drops steeply into a narrow canyon (location pictured above). Although there are a few small diversions on this segment, it operates as free-flowing. Outstanding Remarkable Values - As noted in the Forest Service Handbook Chapter 80 on Wild & Scenic²⁷ the definition of an eligible river is one that "is free-flowing and, in combination with its adjacent land area, possess one or more outstandingly remarkable values"(emphasis added).²⁸ There is an incredibly unique extreme rich fen along Cement Creek.²⁹ In 2004, the Colorado Natural Heritage Program at Colorado State University recommended to the Colorado Department of Natural Resources that the Cement Creek extreme rich fen is a Potential Conservation Area (PCA). The assessment ranked the Cement Creek PCA as having "very high biodiversity significance" and noted that "[t]his PCA supports a globally imperiled (G2) extreme rich fen plant community and numerous state rare plants." In contrast to the wide distribution of intermediate and rich fens, extreme rich fens appear restricted to a small area in Colorado, primarily the west and north portions of South Park and Cement Creek. On a global basis extreme rich fens also appear to be quite uncommon. Only three other small locations of extreme rich fens are known in the Western U.S.³⁰ Not only is the water chemistry unique, but it hosts rare plant communities that include a rare green sedge and an extreme rich fen plant community of Pacific bog sedge and alpine meadow rue along with rare plants such as Rolland's bulrush and variegated scouring rush. These rare plants and rich fen pockets dot the floodplain in various locations in the Cement Creek riparian area. Patches of fen are surrounded by willow and sedge wet meadows.³¹ This incredibly unique, globally imperiled fen should qualify Cement Creek for water chemistry and botanical ORVs.

Response: While valuable fen habitat, the vegetation does not meet our criteria for an outstandingly remarkable value for vegetation.

- **Cottonwood Creek**

Public comment: Cottonwood Creek: Approximately 8 miles from source to national forest/BLM boundary, classification recreational, outstandingly remarkable value vegetation. Immediately downstream of the GMUG portion of Cottonwood Creek, the BLM Uncompahgre Field Office (UFO) has determined its portion of Cottonwood Creek is wild & scenic eligible, with scenic classification. BLM found it to be wild & scenic suitable in the BLM Dominguez-Escalante National Conservation Area Resource Management Plan. The national forest portion of Cottonwood Creek includes no impoundments or structures. The segment crosses FSR 504, and an unpaved road parallels approximately three miles of the stream's upper reach. It therefore qualifies for recreational classification. Cottonwood Creek should be added to the list of streams studied in the draft eligibility evaluation, and it should be found eligible with outstandingly

remarkable value vegetation, consistent with and complementary to eligibility finding, and pending suitability finding, by the BLM.

*Specifically, the stream corridor supports a superior (A-ranked) occurrence of globally vulnerable (G3) narrowleaf cottonwood/skunkbush sumac riparian woodland (*Populus angustifolia*/*Rhus trilobata*). The Colorado Natural Heritage Program (CNHP) includes this segment within the Cottonwood Creek Potential Conservation Area.*

Response: *The GMUG's criteria for both vegetation is different than the criteria the BLM used, and this segment does not meet that criteria.*

"Other" recommended ORVs, scientific and paleontologic, are addressed in comments above.